

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

June 3, 2002

Community Reinvestment Act Performance Evaluation

**Fidelity National Bank
Charter Number: 16275**

**3500 Holcomb Bridge Road
Norcross, Georgia 30092**

Office of the Comptroller of the Currency

**Special Supervision/Fraud
250 E Street, SW Mail Stop 6-4
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of Fidelity National Bank (FNB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Fidelity National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

*The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Overall lending levels reflect an adequate responsiveness to meeting the credit needs of the assessment area (AA).
- An adequate percentage of FNB's loan originations are within the AA.
- The geographic distribution of loans is excellent.
- The distribution of loans by the income level of the borrower is good.
- FNB had a high level of Community Development (CD) loans. As a result, this had a positive effect on FNB's lending test rating.
- Given FNB's size, capacity to invest, and dollar amount of investments in the AA, investment performance is good.
- FNB's retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget,

with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by non-farm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by non-farm residential real estate as "small business loans" if the loans are reported on the TFR as non-mortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings, and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

FNB is an intrastate bank headquartered in Norcross, Georgia and was initially organized in 1974. FNB is a wholly owned subsidiary of Fidelity National Corporation (FNC), a one-bank holding company headquartered in Atlanta, Georgia. As of June 30, 2002, FNC had total combined assets of \$1 billion. Through its subsidiaries, FNC provides financial services, including investment management, mortgage banking, mortgage brokerage, as well as traditional deposit and credit services.

As of June 30, 2002, FNB had total assets of \$1 billion, a loan portfolio of \$832 million, and tier 1 capital of \$84.5 million. The largest segment of the loan portfolio (\$466 million or 56 percent) is consumer loans, many of which are made nationally through an indirect automobile lending program. Credit card loans are 16 percent of loans to individuals. Other major segments of the portfolio include real estate loans, 37 percent, and commercial loans or loans secured by non-farm non-residential real estate, 8 percent. FNB's loan-to-deposit ratio is 101 percent.

In terms of deposit market share, FNB ranks ninth of 127 financial institutions in the AA. In terms of deposit market share, institutions ranking higher than FNB ranged from 2.14 to 15.65 percent. FNB is unique in the AA because competitors are branches of very large banks or are much smaller community banks.

FNB operates 19 full service branches, all of which have attached deposit-taking ATMs; 19 freestanding ATMs in Georgia, one of which is a deposit taking facility; one freestanding ATM in Jacksonville, Florida; and one full service cyber office. FNB operates in six of the 20 counties comprising the Atlanta MA. FNB also operates a loan production office located in Jacksonville, Florida. FNB's performance under the CRA was last evaluated as of August 16, 1999 and was rated Satisfactory.

There were no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The last CRA evaluation was conducted as of August 16, 1999 and included loan performance for the calendar year 1998 only. This evaluation focuses on loan performance for the calendar years 1999 through 2001, except for community development loans, which we reviewed from the date of the last evaluation through June 3, 2002. We reviewed loan products, including small business and home mortgage lending. FNB did not grant any small farm loans during the evaluation period. The Investment and Service Tests include investments and services from August 16, 1999 through June 3, 2002.

Data Integrity

We reviewed files from a representative sample of FNB's HMDA and small business loans granted from January 1, 1999, to December 31, 2001, for accuracy and compared them to reported information. Additionally, we reviewed the accuracy of information FNB provided pertaining to community development investments and services. We found FNB's processes and internal controls for collecting, verifying, and reporting CRA data to be reliable. The data was found to be accurate.

Selection of Areas for Full-Scope Review

FNB has one AA. We completed a full scope review of this AA.

Ratings

FNB's overall rating is based primarily on those areas that received full-scope reviews.

We weighted FNB's HMDA and small business lending similarly, as both are considered key parts of FNB's operations. In the area of HMDA lending, we gave greatest weight to home purchase lending because of its volume coupled with the direct impact on new affordable housing loans. Community development lending was a factor in determining the rating for the lending test, and enhanced FNB's performance under that test. The bank does not make farm loans.

Other

Refer to Appendix B: Market Profiles for Full-Scope Areas for information concerning community contacts.

Fair Lending Review

We analyzed the most recent public comments, consumer complaint information, and HMDA lending data according to the OCC's risk based fair lending approach. Based on the analysis, the OCC determined that a comprehensive fair lending examination was not needed in

connection with the CRA evaluation this year. The most recent fair lending examination was as of June 30, 2001.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

FNB's performance under the lending test is rated "Outstanding." Based on the full-scope review, FNB's performance in the AA is excellent.

Lending Activity

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate FNB's lending activity.

FNB has an adequate level of lending activity in its assessment area (AA). FNB's market share in small business lending is less than half of one percent. FNB's market share of HMDA lending is approximately 2.5 percent. FNB's deposit market share ranks ninth of 127 institutions with offices in the AA at 1.46 percent. As shown in Table 1, FNB and Fidelity National Mortgage Corporation granted approximately \$456 million in home mortgage, small business, and CD loans, within the AA from January 1, 1999, to December 31, 2001. FNB did not make any small farm loans.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent. The geographic distribution of HMDA loans is good. The geographic distribution of small loans to businesses is excellent.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in Appendix C for the facts and data we used to evaluate the geographic distribution of FNB's home mortgage loan originations and purchases.

The geographic distribution of *home purchase loans* is excellent. FNB's percentage of home purchase loans in low- and moderate-income tracts exceeds the percentage of owner-occupied units in these tracts. FNB's market share in low- and moderate- income tracts exceeds its overall market share.

The overall geographic distribution of *home improvement loans* is adequate. FNB's percentage of home improvement loans in low- and moderate-income tracts is lower than the percentage of owner-occupied units in these tracts. In 2001, FNB did not make any home improvement loans in low- or moderate-income tracts. Therefore, FNB has no market share in those tracts for comparison with its overall market share.

The overall geographic distribution of *refinance loans* is excellent. FNB's percentage of refinance loans in low- and moderate-income tracts exceeds the percentage of owner-occupied units in these tracts. FNB's market share in low- and moderate-income tracts exceeds its overall market share.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data we used to evaluate the geographic distribution of FNB's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. FNB's percentage of loans in low and moderate-income tracts exceeds the percentage of businesses located in these tracts. FNB's market share in low- and moderate-income tracts exceeds its overall market share.

Lending Gap Analysis

We reviewed reports detailing the bank's lending distribution during the evaluation period to determine any unexplained gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified. This performance had a positive effect on the bank's overall geographic distribution analysis.

Inside/Outside Ratio

FNB's lending within its AA is adequate. We analyzed loan information and determined that during the evaluation period, 63 percent of the number and 66 percent of the dollar amount of HMDA loans were inside the AA. Similarly, 71 percent of the number and 83 percent of the dollar amount of small loans to businesses were inside the AA. This performance had a positive effect on the bank's overall geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by the income level of the borrower is good. The distribution of HMDA loans is good when considering that it is difficult for low-income borrowers to purchase a home in the AA and opportunities for home improvement and home refinance loans are limited to these borrowers. The median cost of housing in the AA is \$111,000. A low-income person earns less than \$35,600 based on the HUD updated 2002 median family income. Additionally, 7 percent of the households in the assessment area live below the poverty level. We considered these mitigating factors in our home mortgage lending analysis to low-income borrowers. The distribution of small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of FNB's home mortgage loan originations and purchases.

The overall distribution of *home purchase loans* is excellent when considering the difficulty that low-income borrowers have in purchasing a home as discussed above. FNB's percentage of home purchase loans to low-income borrowers is somewhat lower than the percentage of low-

income families living in the AA. FNB's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families living in the AA. FNB's market share of lending to low- and moderate-income borrowers exceeds its overall market share.

The overall distribution of *home improvement loans* is adequate when considering the mitigating factors discussed above. FNB's percentage of home improvement loans to low-income borrowers is significantly lower than the percentage of low-income families living in the AA. FNB's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families living in the AA. FNB's market share of lending to low-income borrowers is near to its overall market share. In 2001, FNB did not make any home improvement loans to moderate-income borrowers. Therefore, FNB has no market share of those borrowers for comparison with its overall market share.

The overall distribution of *refinance loans* is good when considering the mitigating factors discussed above. FNB's percentage of refinance loans to low-income borrowers is significantly lower than the percentage of low-income families living in the AA. FNB's percentage of refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families living in the AA. FNB's market share of lending to low-income borrowers is near to its overall market share. FNB's market share of lending to moderate-income borrowers exceeds its overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of FNB's origination/purchase of small loans to businesses.

The distribution of small loans to businesses is good. FNB's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is near to the percentage of small businesses in the AA. FNB's market share of small loans to small businesses exceeds its overall market share. A majority of the bank's business loans are for amounts of \$100 thousand or less.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate FNB's level of community development lending.

FNB had a high level of community development lending which had a positive effect on its Lending Test rating. For the period from August 16, 1999, to June 3, 2002, FNB made 520 loans totaling \$42.6 million for construction of 520 single-family, affordable houses within FNB's AA and the Atlanta MA. FNB's construction lending department worked in conjunction with area builders to increase the affordable housing inventory within the AA and the Atlanta MA area. These houses are intended for low- and moderate-income families.

Product Innovation and Flexibility

FNB's level of product innovation and flexibility had a neutral impact on the Lending Test rating. FNB has one loan product that is considered flexible. The product is flexible in that it

allows lower credit scores, higher debt service coverage, and loan-to-value ratios in exchange for an interest rate that is 1.25 percent higher than FNB's traditional 30-year fixed rate mortgage loan. The program, Community Home Assistance Program (CHAMPS), was developed in 1999. CHAMPS permits a 100 percent loan-to-value ratio (first mortgage of 95% and second mortgage of 5%). The maximum percentage of monthly gross income allowed for the house payment is 35 percent versus 28 percent for a conventional mortgage. The maximum percentage of monthly income allowed for all monthly debt is 45 percent versus 36 percent for a conventional mortgage. Standard FHA underwriting guidelines apply with certain expanded criteria. During the evaluation period, FNB made seven first mortgages totaling \$658,005 and three second mortgages totaling \$12,195 under CHAMPS.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

FNB's performance under the investment test is rated "High Satisfactory." FNB's investment performance in the Atlanta AA is good.

Refer to Table 14 in Appendix C for the facts and data used to evaluate FNB's level of qualified investments.

Given FNB's size, capacity to invest, and dollar amount of investments in the AA, performance is good. During this evaluation period, FNB made \$1.9 million in qualified investments to community development organizations. These investments are not considered innovative or complex in nature but are responsive to identified needs in the community. FNB has \$1.6 million in prior period community development investments. These investments have a continuing impact that is responsive to identified needs in the community. Total community development investments are 3.5 percent of FNB's total investments and 4.1 percent of tier one capital. All of FNB's community development investments are Fannie Mae Mortgage Backed Securities. All of the underlying mortgages securing the investments are to low- and moderate-income borrowers purchasing residential property within FNB's AA, which responds to an identified need in the AA. There are many qualified investment opportunities in the AA.

FNB made qualified grants and donations totaling \$67,244 to three groups with a purpose of providing community development services targeted to low- or moderate-income individuals or activities that revitalize or stabilize low- or moderate-income geographies.

FNB's investments are indicative of the nature and types of community development investment opportunities existing in FNB's AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Review

FNB's performance under the Service Test is rated "Low Satisfactory." Based on the full scope review, FNB's performance in the Atlanta AA is adequate.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of FNB's branch delivery system and branch openings and closings.

FNB's retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the Atlanta AA.

FNB does not have any branches or deposit-taking ATMs in low-income census tracts. However, branches and deposit-taking ATMs are in close proximity to the 16 low-income tracts in the AA. Nine of the low-income tracts are relatively small and are located in the heart of downtown Atlanta. FNB has a branch in a moderate-income tract that is surrounded by low-income tracts. Of the 16 low-income tracts, six are contiguous to tracts with FNB branches and another eight are contiguous to tracts that border tracts having FNB branches. Only two of the low-income tracts are not in close proximity to a FNB branch. The bank has not closed or opened any branches since the last evaluation.

FNB offers a wide range of banking products and services throughout its AA. Products, services, and business hours are reasonable and do not vary substantially from one location to another.

Community Development Services

FNB's community development services had a neutral effect on the bank's services test. FNB's community development services consisted of three qualifying activities. Management was unable to provide details about the number of bank employees involved and the number of LMI individuals or small businesses served. Community development services consisted of discussing bank products and services and providing financial education to groups in which the majority of its constituents are low- and moderate-income individuals.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes Community Development Loans): 01/01/99 to 12/31/01 Investment and Service Tests and Community Development Loans: 08/16/99 to 06/03/02	
Financial Institution		Products Reviewed
FNB, Norcross, Georgia		HMDA, Small Business, and Community Development Loans, Investments, and Services
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Atlanta AA	Full-Scope	All of Cobb, Dekalb, Forsyth, Gwinnett, Cherokee, and Clayton Counties and a portion of Fulton County. This area comprises a portion of the Atlanta MSA.

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Atlanta AA (Part of Atlanta MA).....	B-2
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Atlanta AA

Demographic Information for Full-Scope Area: Atlanta AA						
Demographic Characteristics	#	Low % Of #	Moderate % Of #	Middle % Of #	Upper % Of #	NA* % Of #
Geographies (Census Tracts/BNAs)	303	5.28	12.54	42.57	38.28	1.32
Population by Geography	1,952,793	2.57	11.16	45.96	40.32	0.00
Owner-Occupied Housing by Geography	463,041	1.09	7.53	43.34	48.04	0.00
Businesses by Geography	243,758	1.98	7.84	42.71	47.47	0.00
Farms by Geography	3,366	1.07	5.50	50.56	42.87	0.00
Family Distribution by Income Level	514,138	14.52	16.58	23.79	45.12	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	159,884	4.97	19.39	52.69	22.95	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$41,047 = \$71,200 = 7.19%	Median Housing Value Unemployment Rate (1990 Census)				111,404 2.58%

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2001 HUD updated MFI.

There are 20 counties in the Atlanta MA. FNB's AA consists of all of Cherokee, Clayton, Cobb, Dekalb, Forsyth, and Gwinnett counties and the northern portion of Fulton County. The AA represents 66 percent of the total MA population. The AA's 303 census tracts are designated as 16 low-income, 38 moderate-income, 129 middle-income, and 116 upper-income. Four are designated as not applicable. The AA complies with regulatory requirements and does not arbitrarily exclude low- and moderate-income areas.

According to the OCC's economic profiles, Atlanta's current economy is very weak, but has begun to show a few signs of improvement. The metro area's strengths will allow it to return to above average growth. Atlanta's top five non-public sector employers are Delta Airlines, Inc., BellSouth Corporation, Wal-Mart Stores, Inc., Emory University, and Headquarters, U.S. Army Garrison. Atlanta's leading industries are personnel supply services, computer and data processing services, telephone communications, trucking and courier services, and professional and commercial equipment. Atlanta's strengths are a diverse economy; above average per capita income; transportation, distribution, and cultural center; strong in-migration and population growth; and presence of affordable housing. Atlanta's weaknesses are overtaxing of the infrastructure due to historically strong growth, weak educational system, and mounting problems associated with suburban sprawl.

FNB is unique in the Atlanta MA. Competitors are dissimilar since they are branches of very large banks or are much smaller community banks. We reviewed recent community contacts conducted by the Federal financial regulators and CRA Performance Evaluations of other banks in the assessment area. These community contacts identified community development

needs for creating affordable housing and other support services for low- and moderate-income residents. These services include job training, budgeting, parenting skills training, drug and alcohol rehabilitation, affordable childcare, and basic home maintenance. In addition, the 1995 Atlanta Consolidated Plan Executive Summary lists increasing the number of affordable low-income housing units and expanding public facilities and services to low-income residents as primary goals. The assessment area has a significant level of opportunities for community development investments and services.

We also performed a community contact during this evaluation to determine opportunities and needs within FNB's AA. The contact is an executive administrator of a multi-issue, multi-racial network of people working in the Atlanta community against racism, war, economic injustice, and environmental destruction. The network's primary function is to organize and assist people most acutely affected by toxins and facing crises that beset poor and working people. The contact perceives the primary need and opportunity within the AA is affordable housing. The contact stated that the Hispanic population is increasing and having difficulty obtaining drivers licenses, automobiles, and housing. The contact stated that there are opportunities for credit related projects throughout the South, particularly housing related projects.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also

presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage

distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME 2001		Geography: STATE OF GEORGIA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,				
MA/Assessment Area (2001):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Atlanta AA	100.00	2,331	283,252	1,151	129,343	0	0	520	42,654	4,002	455,249	100.00

* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From August 16, 1999 to June 03, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2001			Geography: STATE OF GEORGIA						Evaluation Period: JANUARY 1, 1999 TO						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	1,193	100.00	1.09	2.26	7.53	12.15	43.34	46.02	48.04	39.56	0.27	0.46	0.52	0.22	0.28

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2001			Geography: STATE OF GEORGIA						Evaluation Period: JANUARY 1, 1999 TO						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	447	100.00	1.09	0.67	7.53	3.80	43.34	26.62	48.04	68.90	0.17	0.00	0.00	0.19	0.19

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2001			Geography: STATE OF GEORGIA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	691	100.0 0	1.09	1.88	7.53	7.96	43.34	37.77	48.04	52.39	0.29	0.62	0.35	0.24	0.32

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 31, 2001		Geography: STATE OF GEORGIA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	0	0.00	4.24	0.00	16.10	0.00	52.59	0.00	27.07	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2001			Geography: STATE OF GEORGIA								Evaluation Period: JANUARY 1, 1999 TO				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	1,151	100.00	1.98	4.87	7.84	13.12	42.71	31.97	47.47	50.04	0.53	0.95	0.73	0.42	0.62

* Based on 2001 Peer Small Business Data: US&PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2001			Geography: STATE OF GEORGIA						Evaluation Period: JANUARY 1, 1999 TO						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	0	0.00	1.07	0.00	5.50	0.00	50.56	0.00	42.87	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2001		Geography: STATE OF GEORGIA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	1,193	100.00	14.52	12.06	16.58	30.11	23.79	25.92	45.12	31.91	0.35	0.42	0.41	0.33	0.31

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 2.01% of loans originated and purchased by FNB.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2001		Geography: STATE OF GEORGIA								Evaluation Period: JANUARY 1, 1999 TO					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	447	100.00	14.52	3.84	16.58	16.70	23.79	21.22	45.12	58.24	0.19	0.17	0.00	0.12	0.31

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 0.89% of loans originated and purchased by FNB.

*** Percentage of Families is based on the 1990 Census information.

**** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2001			Geography: STATE OF GEORGIA								Evaluation Period: JANUARY 1, 1999 TO				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Atlanta AA	691	100.00	14.52	7.14	16.58	20.62	23.79	27.11	45.12	45.13	0.35	0.31	0.36	0.37	0.34

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 10.85% of loans originated and purchased by FNB.

*** Percentage of Families is based on the 1990 Census information.

**** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2001		Geography: STATE OF GEORGIA		Evaluation Period: JANUARY 1, 1999 TO					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Atlanta AA	1,151	100.00	60.48	58.38	74.80	11.56	13.64	0.53	0.71

* Based on 2001 Peer Small Business Data: US&PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.61% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2001		Geography: STATE OF GEORGIA				Evaluation Period: JANUARY 1, 1999 TO			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Atlanta AA	0	0.00	90.58	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF GEORGIA				Evaluation Period: AUGUST 16, 1999 TO JUNE 3, 2002			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Atlanta AA	3	1,573	5	1,846	8	3,419	100.00	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS AUGUST 16, 1999 TO JUNE 3, 2002								Geography: STATE OF GEORGIA				Evaluation Period:					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Atlanta AA	100.00	19	100	0.00	5.26	26.32	68.42	0	0	0	0	0	0	2.57	11.16	45.96	40.32

